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8 **BEFORE THE**
CALIFORNIA BOARD OF OCCUPATIONAL THERAPY
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Petition to Revoke
Probation Against:

Case No. AL2009-84

12 **ANJULI DILLON KELLEY,**
13 **a.k.a. ANJULI D. KELLEY**
14 **405 Piezzi Road**
Santa Rosa, CA 95401

PETITION TO REVOKE PROBATION

15 **Occupational Therapist License No. OT**
16 **11186**

17 Respondent.

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19 Complainant alleges:

20 **PARTIES**

21 1. Heather Martin (Complainant) brings this Petition to Revoke Probation solely in
22 her official capacity as the Executive Officer of the California Board of Occupational Therapy
23 (Board), Department of Consumer Affairs.

24 2. On or about March 22, 2010, the Board issued Occupational Therapist License
25 Number OT 11186 to Anjuli Dillon Kelley, a.k.a. Anjuli D. Kelley (Respondent). The
26 Occupational Therapist License was in effect at all times relevant to the charges brought herein
27 and will expire on February 28, 2011, unless renewed.

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3. In a disciplinary action entitled *In the Matter of the Statement of Issues Against Anjuli Dillon Kelley, a.k.a. Anjuli D. Kelley*, Case No. AL2009-84, the Board issued a decision, effective March 22, 2010, in which Respondent's Occupational Therapist License was revoked. However, the revocation was stayed and Respondent was placed on probation for a period of three (3) years with certain terms and conditions. A copy of that decision is attached as Exhibit A and is incorporated by reference.

JURISDICTION

4. This Petition to Revoke Probation is brought before the Board under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

5. Section 118, subdivision (b), of the Code provides that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued, or reinstated.

CAUSE TO REVOKE PROBATION

(Abstain from Use of Alcohol)

6. At all times after the effective date of Respondent's probation, Probation Condition 16 stated:

Abstain From Use of Alcohol. Respondent shall completely abstain from the use of alcoholic beverages during the period of probation.

7. Respondent's probation is subject to revocation because she failed to comply with Probation Condition 16, referenced above. The facts and circumstances regarding this violation are as follows:

A. On or about April 8, 2010, Respondent submitted to a random drug test and tested positive for alcohol.

B. On or about April 23, 2010, Respondent admitted that she had consumed alcohol.

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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the California Board of Occupational Therapy issue a decision:

1. Revoking the probation that was granted by the California Board of Occupational Therapy in Case No. AL2009-84 and imposing the disciplinary order that was stayed, thereby revoking Occupational Therapist License No. OT 11186 issued to Anjuli Dillon Kelley, a.k.a. Anjuli D. Kelley;

2. Taking such other and further action as deemed necessary and proper.

DATED: 12 July 2010


HEATHER MARTIN
Executive Officer
California Board of Occupational Therapy
Department of Consumer Affairs
State of California
Complainant

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